

1 The Honorable James L. Robart
2
3
4
5
6
7

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 MICROSOFT CORPORATION, a Washington
9 corporation,

10 Plaintiff,

11 v.

12 MOTOROLA, INC., and MOTOROLA
13 MOBILITY, INC., and GENERAL
14 INSTRUMENT CORPORATION,

15 Defendants.

CASE NO. C10-1823-JLR

DEFENDANTS' NONOPPOSITION TO
MICROSOFT'S MOTION TO FILE
DOCUMENTS UNDER SEAL

NOTED ON MOTION CALENDAR:
Friday, January 6, 2012

16
17
18
19
20
21
22
23
24
25
26
DEFENDANTS' NONOPPOSITION TO MICROSOFT'S
MOTION TO FILE DOCUMENTS UNDER SEAL
CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone: (206) 676-7000
Fax: (206) 676-7001

1 Defendants do not oppose Microsoft's 12/15/11 Motion to File Documents Under Seal re
2 the following documents in support of Microsoft's Motion for Partial Summary Judgment
3 Dismissing Motorola's Claim for Injunctive Relief (Redacted Version ECF No. 141):

4 (1) Limited portions of Microsoft's Motion for Partial Summary Judgment
5 Dismissing Motorola's Claim for Injunctive Relief ("Microsoft's 12/15/11 Motion
for Partial Summary Judgment");

6 (2) Limited portions of the Declaration of Christopher Wion in Support of
7 Microsoft's Motion for Partial Summary Judgment Dismissing Motorola's Claim
for Injunctive Relief (the "12/15/11 Wion Declaration");

8 (3) Exhibit 5 to the 12/15/11 Wion Declaration; and

9 (4) Exhibit 6 to the 12/15/11 Wion Declaration.

10 Nothing herein is intended as a waiver of Defendants' right to contest Microsoft's
11 designation of material as Confidential Business Information in accordance with the terms of the
12 Protective Order entered on July 21, 2011 (ECF No. 72). Defendants expressly reserve the right to
13 do so as the circumstances warrant.

14 DATED this 4th day of January, 2012.

15 SUMMIT LAW GROUP PLLC

16
17 By /s/ Philip S. McCune
18 Philip S. McCune, WSBA #21081
19 Lynn M. Engel, WSBA #21934
philm@summitlaw.com
lynne@summitlaw.com

20 And by

21 Steven Pepe (*pro hac vice*)
22 Jesse J. Jenner (*pro hac vice*)
23 Stuart W. Yothers (*pro hac vice*)
24 Ropes & Gray LLP
25 1211 Avenue of the Americas
26 New York, NY 10036-8704
(212) 596-9046
steven.pepe@ropesgray.com
jesse.jenner@ropesgray.com
stuart.yothers@ropesgray.com

1 Norman H. Beamer (*pro hac vice*)
2 Gabrielle E. Higgins (*pro hac vice*)
3 Ropes & Gray LLP
4 1900 University Avenue, 6th Floor
5 East Palo Alto, CA 94303-2284
6 (650) 617-4030
7 *norman.beamer@ropesgray.com*
8 *gabrielle.higgins@ropesgray.com*

9 Paul M. Schoenhard (*pro hac vice*)
10 Kevin J. Post (*pro hac vice*)
11 Ropes & Gray LLP
12 One Metro Center
13 700 12th Street NW, Suite 900
14 Washington, DC 20005-3948
15 (202) 508-4693
16 *paul.schoenhard.@ropesgray.com*
17 *kevin.post@ropesgray.com*

18 ***Attorneys for Defendants Motorola Solutions,
19 Inc., Motorola Mobility, Inc., and General
20 Instrument Corporation***

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Arthur W. Harrigan, Jr., Esq.
Christopher T. Wion, Esq.
Shane P. Cramer, Esq.
Danielson, Harrigan, Leyh & Tollefson LLP
arthurh@dhlt.com
chrisw@dhlt.com
shane@dhlt.com

Brian R. Nester, Esq.
David T. Pritikin, Esq.
Douglas I. Lewis, Esq.
John W. McBride, Esq.
Richard A. Cederoth, Esq.
Sidley Austin LLP
bnester@sidley.com
dpritikin@sidley.com
dilewis@sidley.com
jwmcbride@sidley.com
rcederoth@sidley.com

T. Andrew Culbert, Esq.
David E. Killough, Esq.
Microsoft Corp.
andycu@microsoft.com
davkill@microsoft.com

DATED this 4th day of January, 2012.

/s/

Marcia A. Ripley

Marcia A. Ripley

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S
MOTION TO FILE DOCUMENTS UNDER SEAL - 3
CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone: (206) 676-7000
Fax: (206) 676-7001